

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
SHELBY DIVISION

IN RE: CALVIN DONNELL ROSEBORO)	Bankruptcy Case No:
Debtor)	16-40337
)	Chapter 13
SSN: xxx-xx-)	
_____)	

RESPONSE TO CREDITOR'S RESPONSE TO
TRUSTEE'S MOTION TO DEEM MORTGAGE CURRENT

The Debtor hereby responds to U.S. Bank Trust National Association, as Trustee of the FW-BKPL Series I Trust ("Creditor") Response to Trustee's Motion to Deem Mortgage Current as follows:

1. The Debtor's attorney has reviewed the documentation provided by the Creditor and it does not provide for all the payments made by the Trustee.
2. Debtor's attorney has reviewed the payment history as shown on the Chapter 13 Trustee's website which reflects the Debtor having never missed a conduit payment to the Trustee, and the Trustee never missed making a conduit payment to the Creditor.
3. Debtor's attorney believes the Trustee information is correct and the Creditor's is incorrect.

WHEREFORE, the Debtor moves the Court as follows:

1. The Trustee's Motion to Deem Current be determined to be correct as the Debtor has made all mortgage payments required under his bankruptcy petition.

This the 31st day of January, 2022.

LUTZ LAW FIRM, PLLC

By /s Robert H. Lutz
Robert H. Lutz
Attorney for Debtor
310-8 East Graham Street
Shelby, NC 28150
Phone No: 704-600-6003
Fax No: 704-600-6004
State Bar No: NC 16375

CERTIFICATE OF SERVICE

This is to certify that I have this date served the following in the above named matter with a copy of the foregoing by placing a copy of same in the United States mail, postage paid, addressed to:

Mr. Steven G. Tate
Chapter 13 Trustee
1318 D Davie Avenue
Statesville, NC 28677

Mark A. Baker
Attorney for Creditor
3550 Engineering Drive, Suite 260
Peachtree Corners, GA 30092

This the 31st day of January, 2022.

LUTZ LAW FIRM, PLLC

By /s Robert H. Lutz
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Attorney for Debtor
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